



State of New Jersey
Department of Environmental Protection and Energy
Division of Responsible Party Site Remediation
CN 028
Trenton, NJ 08625-0028

Jeanne M. Fox
Acting Commissioner

Karl J. Delaney
Director

OCT 26 1993

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Edward A. Hogan, Esq.
Porzio, Bromberg & Newman
163 Madison Avenue
Morristown, NJ 07960

RE: Hexcel Corporation
Lodi Borough, Bergen County
ISRA Case #86009

Dear Mr. Hogan:

This is to advise you that the New Jersey Department of Environmental Protection and Energy (NJDEPE) has completed a review of the progress reports dated May 15, 1993, June 15, 1993, July 15, 1993 and August 15, 1993. Based on the review, the NJDEPE's comments are referenced below.

I Soil Conditions

Soil Sampling Location G-3

1. The addition of soil sampling location G-3 into the soil gas survey is acceptable.

AOC 5

2. Hexcel Corporation's proposal to address AOC 5 (merged into remedial AOC1) via the proposed additional delineation in the form of a soil gas survey is acceptable with the following conditions. Hexcel Corporation shall include the industrial sewer and the area in the vicinity of boring 508 into remedial AOC 2 and due to the identification of product in boring 508 collect a post remedial confirmation sample at this location. Hexcel has stated that an industrial sewer does not exist in this area. It should be noted that this statement contradicts previous information which has been submitted to the NJDEPE regarding this AOC. Previous site maps including Heritage Plate 2, dated June 30, 1990 and a 1987 Environ Plate 2 entitled Drainage System Plan depict an industrial sewer of vitrified clay pipe emanating from beneath the Administration building.

NOTE
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AOC 7

3. Hexcel Corporation's proposal to merge this area into remedial AOC 3 and refine the boundaries of this AOC via the soil gas survey is acceptable with the following conditions. Hexcel Corporation shall evaluate the potential for contaminants to have migrated along the sewer line in the soil gas survey. In addition, Hexcel Corporation shall provide the depth of the sewer line from any survey point which is located along the sewer line.

AOC 13

4. Hexcel Corporation has proposed to merge a portion of this AOC into remedial AOC 3 and refine the boundaries of this AOC via the soil gas survey. Post remedial samples will be collected after the soil cleanup phase is completed. Hexcel Corporation contends this investigation is sufficient to address this AOC and thus does not propose to install boring 1304, on the building side of manhole M1. The NJDEPE finds this proposal unacceptable. The installation of the boring was required to evaluate the potential sources of contamination between the building and the manhole, into which periodic oily product seepage was previously reported. Due to the nature of the contamination in this area an excavation of the area appears to be a more effective method of determining the source of this material. The soil gas survey would not be effective if the contaminants in question are non-volatile. If no evidence of contamination (i.e. visual and field screening) is discovered during excavation, the collection of soil samples at boring 1304 may potentially be eliminated.

Revised Soils Remediation Time Schedule

5. The NJDEPE has reviewed the revised remediation time schedule included in the June 15, 1993 progress report and has found it to be acceptable provided that the work be conducted concurrently with the ground water remedial investigations\actions.

II Ground Water

6. NJDEPE acknowledges Hexcel Corporation's request for a meeting to discuss the required bedrock ground water investigation in the area of MW1 and MW17. Hexcel Corporation shall submit an agenda for the meeting and contact the case manager to schedule a time and date for the meeting.

7. Hexcel Corporation shall indicate whether CW3 was equipped with a pump as had been previously proposed.

8. In the NJDEPE's letter dated January 19, 1993, the NJDEPE conditionally approved Hexcel Corporation's DNAPL monitoring and recovery proposal. The approval called for operation of RW7-1, RW7-5 and MW8 as the DNAPL recovery system and for manual pumping of DNAPL at other wells as needed. The NJDEPE understood that Hexcel Corporation would not initiate this DNAPL recovery program until Hexcel Corporation had a permanent discharge point in place.

The NJDEPE has since reviewed the DNAPL measurements submitted in the March, 1993 and June, 1993 monthly progress reports. DNAPL thickness in wells MW6 and MW8 has remained at 1 foot or greater while DNAPL thickness at well CW16 has measured over 2 feet. The NJDEPE, upon re-evaluation has concurred that the DNAPL recovery should be performed immediately and should not be deferred

until a permanent ground water discharge point is in place. Hexcel Corporation shall either implement the approved DNAPL recovery plan immediately and dispose of recovered ground water off-site, or shall submit an alternate, interim, DNAPL recovery proposal.

The NJDEPE is also concerned that the pumping of DNAPL at the DNAPL recovery well may not be sufficient to control the discharge of DNAPL to the Saddle River or the migration of DNAPL under the stream, whichever may be occurring. This issue was previously raised with Hexcel Corporation in earlier discussions with the NJDEPE accepting Hexcel Corporation's response that the clay surface, which appears to slope downward from the Saddle River to the MW6 area, was preventing migration of DNAPL toward Saddle River. Upon review of the DNAPL monitoring data and re-evaluation of the issue, the NJDEPE believes that this might not be the case. The NJDEPE believes that the only way to successfully control the DNAPL is to install a barrier, such as sheet piling, along the river into the clay. Such a barrier might also enhance recovery of DNAPL and the dissolved contaminant plume. Hexcel Corporation shall submit an evaluation of this issue.

9. Hexcel Corporation shall indicate whether MW8 has been connected to the RW7-1/RW7-5 DNAPL recovery system.

10. The DNAPL data tables submitted in the March 1993 and June 1993, monthly progress reports indicate that CW17 has not been included in the DNAPL monitoring as required in the NJDEPE's letter dated January 19, 1993. Hexcel shall include CW17 in future DNAPL monitoring.

11. Hexcel Corporation has stated their inability to gain access to the Academy Auto Recyclers, Inc. property for the installation of a shallow overburden monitoring well on the opposite side of the Saddle River. Hexcel Corporation shall evaluate if any other locations can be utilized for the installation of this monitoring well. Hexcel Corporation shall submit a site map which depicts the Hexcel Corporation site, the Saddle River and all properties located across the Saddle River from the site.

12. Hexcel Corporation shall submit a revised time schedule for the ground water investigation/remediation which includes all the items requested as referenced above.

III General Comments

13. Please be advised, that after fulfilling the requirements of this letter in the next monthly progress report, Hexcel Corporation is longer required to submit monthly progress reports. After the submission of the next monthly progress report, Hexcel Corporation shall submit progress reports on a quarterly basis. Hexcel Corporation shall submit progress reports in the months of January, April, July and October to document the site activities for the previous quarter.

14. Hexcel Corporation shall notify the case manager at least 14 calendar days prior to initiation of any remedial activities on site.

Please be advised that the NJDEPE is currently reviewing the monthly progress report dated September 17, 1993.

Attached is a Dispute Resolution Guidance document, created pursuant to P.L. 1993, c.139. This document establishes the procedure through which a person conducting a remediation of a contaminated site with NJDEPE oversight may dispute a NJDEPE decision concerning the remediation.

If you have any questions regarding this matter, please contact the Case Manager, Joseph J. Nowak, at 609-633-7141.

Sincerely,

A handwritten signature in dark ink, appearing to read "Douglas Stuart", followed by a stylized flourish or set of initials.

Douglas Stuart, Chief
Bureau of Environmental Evaluation
and Cleanup Responsibility Assessment

c: Michael McCann, BEERA
Beverly Phillips, BGWPA
William Nosil, Hexcel Corporation
William Hoehlein, Killam Associates
James Higdon, FOA Corporation

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